

RM 222

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FROM	
Name	VICTORIA MILLS
Company	SCC Communications Corporation
Address	6285 Lockout Road
City, State, Zip	Boulder, Colorado 80301
Telephone	303-581-5600
Fax	303-581-0900

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TO	
Name	ATTN: OFFICE OF THE SECRETARY
Company	
Address	
City, State, Zip	
Telephone	
Fax	202/418 2813

## NOTES

## NOTICE OF CONFIDENTIALITY

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Federal Communications Commission  
Office of Secretary

William S. Katon  
Secretary of the FCC  
1919 M Street, Room 222, NW  
Washington, DC 20554  
Fax: 202/418-0294

RE: CC Docket No. 94-102  
COMMON CARRIER BUREAU SEEKS COMMENT ON ENHANCED 911 WIRELINE  
CONSENSUS AGREEMENT

Dear Mr. Katon:

I am responding to the recent public notice of the Enhanced 911 Wireline Consensus Agreement. I am the product manager for SCC Communications. SCC Communications is the largest and fastest growing provider of services and information technology systems for the public safety market in North America. We are the leading provider of 9-1-1 database management infrastructure in North America. One of our products we offer plays an integral part in managing ANI/ALI data for Multi-line Telephone System (MLTS) users. Private Switch ALI (PS/ALI) provides access to the 9-1-1 database and data management functions to owners of MLTS. Currently, Ameritech, U S West, and Bell South distribute PS/ALI within their regions to their business customers. We also have several ALEC customers that have the option to deploy the tool at their business customer's site.

I have reviewed the Enhanced 911 Wireline Consensus Agreement and would like to provide a few comments. The comments that I present, ironically, are not derived from any business or product concerns, but are based purely in what I intuitively know as an employee or what I have experienced while employed in the public safety industry.

1.) Square Footage Requirement - Intuitively speaking, I think 40,000 square feet is too large of an area to search in the precious few minutes a responding unit has to revive a seriously ill or injured caller. Take SCC as a case in point: If I dialed 9-1-1 from my office, I would not be comfortable that responders would be able to find me in time if I had a serious heart attack. SCC is an 80,000 square feet, single address facility, thus making it a "Level Two Business Location". I am assuming that for minimum compliance and for logical reasons, we would divide our building into two floors, with my office being on the first floor. Searching the first floor with its 40,000 square feet maze of cubicles, offices and conference rooms would take too long! I am certain that my situation is not uncommon in the "Level Two Business Locations" category.

I feel that a 20,000 square feet minimum requirement would be more palatable, however I am not nor never have been, an emergency responder. Certain justifications about the 40,000 square feet requirement from the public safety community would be prudent.

2.) I propose that a specific definition of what an "adequate signaling and response system" consists of is necessary. At a minimum, the public safety community should define what minimum information is required for adequate response instead of leaving this matter with the "workplace safety authorities" who may or may not be in touch with their local PSAP's response needs.

3.) Business Locations MLTS that are exempt because they have an "adequate signaling and response system", should also have an attendant available at all times, i.e. 24 hours. Attendant availability was not clear in the Business Locations MLTS as it was under the Permanent Resident and Large Hotel/Motel MLTS.

4.) The maximum compliance time of 7 years for most of the Business Locations MLTS seems a bit too lenient. Although, completely unpredictable, a case can be made that the new rules probably will save several *more* lives if a 5 year timeframe is required instead (as in the Wireless Phase Two requirement).

I appreciate the opportunity to submit my concerns. I do hope that this reaches you in time as I had trouble getting a copy of the consensus agreement (ITS is very unreliable). If you have any questions, you may reach me at 303/581-5751.

Sincerely,

A handwritten signature in black ink, appearing to read 'Victoria Mills', with a stylized, cursive script.

Victoria Mills